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Attorneys for Non-Parties Aurora Innovation, LLC,
Christopher Urmson, Nuro, Inc., and David Ferguson

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO, LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; and OTTO TRUCKING
LLC

Defendants.

CASE NO. 3:17-CV-00939

**DECLARATION OF DAVID FERGUSON
IN SUPPORT OF NON-PARTIES DAVID
FERGUSON AND NURO, INC.'S
MOTION TO QUASH OR MODIFY
SUBPOENA AND FOR PROTECTIVE
ORDER**

Date: TBD

Time: TBD

Courtroom: F (15th Floor)

Judge: Hon. Jacqueline Scott Corley

Trial Date: October 2, 2017

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

DECLARATION OF DAVID FERGUSON

I, David Ferguson, declare and state as follows:

1. I am the President and co-founder of Nuro, Inc. (“Nuro”), which I understand has been subpoenaed by Uber Technologies, Inc. and Ottomotto LLC (together, “Defendants”) in the above-captioned litigation. The matters set forth herein are based on my personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. As a technology company in Silicon Valley, maintaining the confidentiality of our trade secret and other sensitive commercial information is critical to Nuro’s success.

3. [REDACTED]

4. Nuro has enacted a number of mechanisms in order to maintain the secrecy of its Confidential Information. Among others, Nuro limits the number of people with access to sensitive information, maintains strict internal policies regarding confidentiality, has avoided releasing any information regarding its developments and products, and utilizes nondisclosure and similar agreements whenever confidential information must be discussed outside of the company.

5. [REDACTED]

6. [REDACTED]

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[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



David Ferguson